

1 Anna Y. Park, CA SBN 164242  
2 Sue J. Noh, CA SBN 192134  
3 Rumduol Vuong, CA SBN 264392  
4 Derek W. Li, CA SBN 150122  
5 U.S. EQUAL EMPLOYMENT  
6 OPPORTUNITY COMMISSION  
7 255 East Temple Street, Fourth Floor  
8 Los Angeles, CA 90012  
9 Telephone: (213) 894-1083  
10 Facsimile: (213) 894-1301  
11 E-Mail: lado.legal@eeoc.gov

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

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11 EQUAL EMPLOYMENT OPPORTUNITY ) Case No.: 2:16-cv-02187-RFB-PAL  
12 COMMISSION, )  
13 Plaintiff, ) **JOINT STIPULATION FOR AN ORDER**  
14 ) **CONTINUING THE DEADLINE TO**  
15 vs. ) **SUBMIT A PROPOSED JOINT**  
16 WYNN LAS VEGAS, LLC; and DOES 1-10, ) **PRETRIAL ORDER; [PROPOSED]**  
17 INCLUSIVE, ) **ORDER; CERTIFICATE OF SERVICE**  
18 Defendants. )  
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1 Plaintiff United States Equal Employment Opportunity Commission ("EEOC") and  
2 Defendant Wynn Las Vegas, LLC ("Wynn"), by and through their undersigned counsel,  
3 stipulate to the following:

4 1. On September 16, 2016, Plaintiff EEOC filed a complaint alleging that  
5 Defendant Wynn violated the Americans with Disabilities Act of 1990, as amended by the ADA  
6 Amendment Act of 2008 by unlawfully discriminating and retaliating against EEOC's Claimant  
7 Solomon Hussey. (ECF No. 1). On November 14, 2016, Defendant Wynn filed its Answer.  
8 (ECF No. 5). Subsequently, Defendant filed its Motion for Summary Judgment; and the EEOC  
9 filed its Motion for Partial Summary Judgment. (ECF No. 26, 27)

10 2. On July 10, 2018, the Court denied Defendant's Motion for Summary Judgment  
11 and the EEOC's Motion for Partial Summary Judgment. (Order 17, ECF No. 38). The Court  
12 ordered both Parties to be referred to the Magistrate Judge for the purposes of scheduling a  
13 settlement conference. (*Id.*). The Court also ordered the Parties to submit a Proposed Joint  
14 Pretrial Order by August 31, 2018.

15 3. The EEOC and Defendant request for an extension of the deadline to submit a  
16 Proposed Pretrial Order for two months from August 31, 2018 to October 31, 2018.

17 4. The EEOC and Defendant request for an extension of the deadline due to the  
18 respective leave schedule of counsel for the remainder of July and August 2018. Defense  
19 counsel represents that he will be on leave starting on July 17, 2018 for around two weeks.  
20 EEOC's counsel represents that he will be on leave for a week from August 9 through 16, 2018.  
21 Factoring in time to allow both Parties to prepare for settlement, including the preparation of the  
22 respective settlement briefs, the Parties estimate that a reasonable scheduling of a settlement  
23 conference would be no earlier than September 2018.

24 5. The EEOC and Defendant also request for an extension of the deadline to  
25 conserve resources to maximize the chances of settlement. The settlement conference is likely  
26 to be scheduled no earlier than September 2018. With the current deadline for the submission of  
27 a Proposed Joint Pretrial Order by August 31, 2018, resources and the Parties' attention would  
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1 need to be diverted to prepare a Proposed Joint Pretrial Order. Such resources may be better  
2 served to attempt to settle the case first before preparing for trial.

3       6.      Thus, the Parties request for an Order extending the deadline to submit a  
4 Proposed Joint Pretrial Order from August 31, 2018 to October 31, 2018.

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6      Dated: July 17, 2018

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8      */s/ Derek W. Li*  
9      Derek W. Li  
U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
10     255 East Temple Street, Fourth Floor  
Los Angeles, CA 90012  
11     Telephone: (213) 894-1077  
Facsimile: (213) 894-1301  
12     Attorneys for Plaintiff

13

14      Dated: July 17, 2018

15

16      */s/ Nicole A. Young*  
17      Scott M. Abbott   #4500  
Nicole A. Young   #13423  
Kamer Zucker Abbott  
3000 West Charleston Blvd., Suite 3  
Las Vegas, NV 89102  
18      Telephone: (702) 259-8640  
Facsimile: (702) 259-8646  
19      Attorneys for Defendant Wynn Las Vegas, LLC

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21      **[PROPOSED] ORDER UPON STIPULATION**

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23      For good cause shown, IT IS SO ORDERED.

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25      Dated: July 18, 2018.

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1 Anna Y. Park, CA SBN 164242  
2 Sue J. Noh, CA SBN 192134  
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4 Derek Li CA SBN 150122  
5 U.S. EQUAL EMPLOYMENT  
6 OPPORTUNITY COMMISSION  
7 255 East Temple Street, Fourth Floor  
8 Los Angeles, CA 90012  
9 Telephone: (213) 894-1083  
10 Facsimile: (213) 894-1301  
11 E-Mail: [lado.legal@eeoc.gov](mailto:lado.legal@eeoc.gov)

12 Nechole M. Garcia, NV SBN 12746  
13 U.S. EQUAL EMPLOYMENT  
14 OPPORTUNITY COMMISSION  
15 333 Las Vegas Boulevard South, Suite 5560  
16 Las Vegas, NV 89101  
17 Telephone: (702) 388-5072  
18 Facsimile: (702) 388-5094  
19 E-Mail: [nechole.garcia@eeoc.gov](mailto:nechole.garcia@eeoc.gov)

20 Attorneys for Plaintiff  
21 U.S. EQUAL EMPLOYMENT  
22 OPPORTUNITY COMMISSION

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 U.S. EQUAL EMPLOYMENT ) Case No: 2:16-cv-02187-RFB-PAL  
26 OPPORTUNITY COMMISSION, )  
27 Plaintiff, )  
28 vs. )  
29 WYNN LAS VEGAS, LLC, )  
30 Defendant. )  
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## CERTIFICATE OF SERVICE

I am, and was at the time the herein mentioned delivery took place, a citizen of the United States, over the age of eighteen (18) years.

I am employed in the Legal Unit of the Los Angeles District Office of the United States Equal Employment Opportunity Commission.

My business address is U.S. Equal Employment Opportunity Commission, Los Angeles District Office, 255 East Temple Street, 4th Floor, Los Angeles, California 90012.

On the date that this declaration was executed, as shown below, I served the following:

1. JOINT STIPULATION FOR AN ORDER CONTINUING THE DEADLINE TO SUBMIT A PROPOSED JOINT PRETRIAL ORDER; [PROPOSED] ORDER; CERTIFICATE OF SERVICE

via the Court's CMECF electronic filing system and/or first class mail / email to Defendant's counsel:

Scott M. Abbott  
Kamer Zucker & Abbott  
3000 West Charleston Blvd, Suite 3  
Las Vegas, NV 89102  
[sabbott@kzalaw.com](mailto:sabbott@kzalaw.com)

Nicole A. Young  
Kamer Zucker & Abbott  
3000 West Charleston Blvd., Suite 3  
Las Vegas, NV 89102  
[nyoung@kzalaw.com](mailto:nyoung@kzalaw.com)

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2018.

/s/ Derek Li  
Derek Li